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Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of
Proposal for Creation of the Low Power FM
(LPFM) Broadcast Service
Docket No. MM 99-25

To: Federal Communications Commission

Reply Comments of Randall C. Wright

As a current broadcaster committed to quality radio service in our nation, I fully support the LPFM proposal as an advancement for our industry and a wonderful opportunity to increase community service in cities and rural areas across the United States. But, for LPFM to be successful and thrive it must be integrated into the regular broadcast industry. With that in mind, several aspects of the current LPFM proposal must be carried through in the final rulemaking to successfully complete the new service.

I have read with much disappointment the comments of groups such as the National Association of Broadcasters and several special interest groups who have either come out totally against the LPFM concept or feel it should be of very low power (less than 100 watts) and be non-commercial in nature.

The NAB's comments are founded in economic concerns about the competition LPFM would provide which should not play into the LPFM decision-making process of the FCC. The NAB's protectionist rhetoric holds no value in this discussion concerning improving service to the citizens of this nation and providing individuals with new opportunities to enter the broadcast industry. In

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addition, according to two sources I have contacted, the technical study quoted by the NAB was fudged to enhance their weak position concerning technical interference. According to engineer Rodger Skinner, LPFM stations will not produce substantial interference and the proposal will work as designed with no compromise of the technical integrity of the FM band. In addition, the transition to digital will not be adversely affected by LPFM.

Several special interest groups have come out in support of LPFM, but not as a commercial service. These groups obviously have little knowledge of the broadcast industry and the substantial amount of financial support necessary to operate a radio station. To approve LPFM only as a non-commercial service would send the new service to a quick and untimely demise. These new stations will need the ability to sell advertising just as their full-power competition does in order to remain competitive and solvent for years to come. While non-commercial LPFM stations should be licensed in the non-commercial area of the FM spectrum (88.1 mhz-91.9 mhz), LPFM stations licensed in the commercial portion of the band (92.1 mhz-107.9 mhz) should have the ability to operate commercially if the licensee so chooses.

As someone with 20 years of experience in the management, sales, programming and promotional aspects of the radio and television industry, I would like to again state my full support for LPFM with the following primary foundations on which to build the new service:

1. LPFM must be licensed as both commercial and non-commercial in the same fashion current FM stations are allocated. 88.1 mhz-91.9 mhz as non-commercial. 92.1 mhz-107.9 mhz as commercial.

2. The LPFM proposal should allow for the relaxization of the second and third channel adjacent rules. Receiver studies by reliable, independent sources show no interference by LPFM signals and through this relaxization of guidelines, the maximum number of LPFM stations would be possible across the nation.

3. LPFM stations should be licensed in the following manner to allow for integration into the full-power broadcast industry as quickly and easily as possible:

Class A	6000 Watts
Class A-1	3000 Watts
Class A-2	1000 Watts (LPFM)
Class A-3	100 Watts (LPFM)

By introducing LPFM into service as a FM class "A" station, licensees will have to abide by similar rules and regulations as full-power broadcasters and will more quickly be seen as serious operators intent on becoming good, solid members of the industry.

4. LPFM stations should be licensed as an A-2 station for power levels from 100-1000 watts and as an A-3 for effective radiated power levels of 10-100 watts. Through the utilization of power "ranges", it will provide the flexibility needed to license the maximum number of LPFM stations while maintaining the separation needed to maintain the integrity of the FM band.

5. The average height above terrain rule should allow for LPFM antennas to be placed at 328 feet thereby allowing for the maximum coverage with low power. Current class "A" stations are allowed to operate at this height and

LPFM should be allowed similar status.

6. LPFM station ownership should be limited to ten stations across the United States by one entity. While much more strict than what current full-power licensees can own, this will provide ample opportunity for new entrants to get into broadcasting while still providing a chance to utilize economies of scale to operate an efficient broadcasting company.
7. LPFM licenses should be issued on a first come, first serve basis. If this method is not utilized, I might suggest some sort of auction to place LPFM licenses in the hands of new broadcasters.
8. Ownership of LPFM licenses by current broadcasters of newspaper owners should not be allowed. The point of LPFM was to provide ownership to new entrants into the media industry, not to those already holding a voice in communities across the nation. Several comments have noted the possibility of replacing AM daytimers with a LPFM station. While I am not opposed to this concept, the current broadcaster should only be allowed to hold a LPFM license if, and only if, a new entrant has not claimed a LPFM channel in that community. If, after, a certain licensing window has passed, and a specific LPFM channel has not been claimed by a new entrant, then the current daytimer licensee should be allowed to replace his AM with a LPFM license.
9. All Americans, regardless of race or gender, should be treated equally in the licensing of LPFM stations. Equal opportunity to become a LPFM license holder should

be afforded to all citizens of the United States. The only exception to this would be those convicted of operating unlicensed pirate radio stations. Individuals who have been breaking the laws concerning radio station operation should not be granted the honor of holding a license, regardless of the power output of that station.

To reiterate, I fully support LPFM as a sound concept from both a technical and service standpoint. Smaller communities across the nation will again have the return of local radio service and metropolitan areas will find enhanced community programming.

But, for LPFM to succeed and thrive, please consider the previous suggestions for the rulemaking. I applaud the FCC for its forward thinking through the LPFM proposal. This concept will do much to put the "local" back into radio in cities large and small across America. Thank you for your consideration of my reply comments.

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